

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI**

BARBARA JOHNSON, *et al.*

Plaintiffs,

v.

GOVERNOR MICHAEL L. PARSON., *et al.*,

Defendants.

No. 4:24-cv-00174-BP

**STATE DEFENDANTS' MOTION FOR LEAVE  
TO EXCEED THIS COURT'S PAGE LIMITATION FOR THEIR  
SUGGESTIONS SUPPORTING THEIR MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT**

Defendants Governor Michael L. Parson; Attorney General Andrew Bailey; and Secretary of State Jay Ashcroft respectfully moves this Court to issue an order granting them leave to file their suggestions supporting their motion to dismiss Plaintiffs' complaint in excess of the 15 page limit provided by Local Rule 7.0(d)(1)(A). In support, Defendants state the following:

1. On May 6, 2024, Plaintiffs filed their first amended complaint with this Court. (Doc. 11).
2. Plaintiffs' amended complaint challenges the entirety of Chapter 84 of the Missouri Revised Statutes. Am. Compl. ¶ 1.
3. Chapter 84 contains 89 different sections. Mo. Rev. Stat. §§ 84.015–.890.
4. Defendants will move to dismiss based on Rule 12(b)(1) and 12(b)(6) and file supporting suggestions.
5. Defendants' supporting suggestions must not exceed 15 pages unless this Court orders otherwise. L.R. 7.0(d)(1)(A).
6. After multiple drafts attempting to not go beyond this Court's local rule page limitation, Defendants' suggestions supporting their motion to dismiss, when excluding the signature block, certificate of service, statement of fact, table of contents, and table of authority,

Defendants' supporting suggestions is just over 23.5 pages long. L.R. 7.0(d)(2)–(3) (“[S]ignature blocks, certificates of service, and statements of fact . . . do not count toward these page limitations. . . . [A] table of contents and table of authorities . . . do no not count toward these page limitations.”).

7. Defendants' counsel has communicated with Plaintiffs' counsel via emails to determine whether Plaintiffs would oppose this motion.
8. Plaintiffs' counsel has represented that Plaintiffs are agreeable as to an additional five pages (20 pages total) but would object to pages beyond that number.
9. The current length of Defendants' supporting suggestions is necessary to develop the arguments Defendants must raise to adequately lay out, analyze, and defend their arguments relevant to standing and to defend against Plaintiffs' attacks implicating the entirety of Chapter 84 of Missouri's Revised Statutes.
10. Defendants move this Court to issue an order granting them leave to file their suggestions in support of their motion to dismiss Plaintiffs' complaint in excess of the 15 page limit provided by Local Rule 7.0(d)(1)(A) so this Court may consider the entirety of Defendants' supporting suggestions in its current length.

Dated: May 13, 2024

Respectfully submitted,

**ANDREW BAILEY**  
Attorney General

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*Counsel for State Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 13, 2024, the foregoing was filed electronically through the Court's electronic filing system to be served electronically on all counsel of record.

/s/ Caleb Rutledge